

MARYLAND



Egg Council, Inc.

PROMOTION • EDUCATION • SERVICE

4608 '99 SEP 21 110 32

September 17, 1999

Dockets Management Branch (HFA-305)  
Food and Drug Administration  
5630 Fishers Lane  
Room 1061  
Rockville, MD 20852

RE: Docket Nos. 98N1230, 96P-0418, and 97P-0197

Dear Sir or Madam:

The membership of the Maryland Egg Council applauds the intent and effort of FDA to assist in assuring the wholesomeness of shell eggs for consumers. However, we believe that the proposed label wording [above reference, §101.17, (h)(1)] fails to achieve a desirable result in six ways: as read and interpreted by a consumer, the reference to harmful bacteria and disease is excessively alarming and is likely to result in reduced consumption of a recognized nutrient-rich food that is an important contributor to a healthy diet. Second, the focus on alarming the consumer lessens its ability to educate the consumer in appropriate food safety techniques. Third, we are not aware of any other perishable, high protein food that can contain pathogens which is required to identify a particular group of consumers as being especially "vulnerable". Fourth, by its length it may be overlooked or ignored by many, and, therefore, its impact and its contribution to increased food safety awareness will be negated. Fifth, in light of other required labeling of egg cartons, appropriate space to include additional lengthy messages is limited; this label will become lost among many. Finally, since the ultimate audiences are different, the label for an egg carton intended for the average household needs to be different from that on bulk eggs destined for food service establishments.

We would recommend that a warning and safe handling statement for consumer households be concise and to the point; e.g., "Keep refrigerated and cook thoroughly". For all egg cases, we would endorse a label specifying: "Handle Safely: refrigerate promptly; don't cross contaminate; clean hands and surfaces often; cook to proper temperature", or its equivalent.

96P-0418

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The Maryland Egg Council endorses the many recent initiatives which have been implemented cooperatively by industry, government, and consumer groups. The American Egg Board's *Fight BAC!* program, the Pennsylvania and Maryland Egg Quality Assurance Programs, the United Egg Producers Five Star quality assurance program, and the many local, independent educational efforts to assist homemakers and food service sector clients in learning and implementing best practices for food hygiene are some examples. Labeling for food safety needs to recognize and intermesh with these already functioning programs. We believe the recommended modifications to the labels for egg cartons and cases will work harmoniously with on-going efforts to face the challenges of *S. enteritidis* and other food-borne pathogens.

Thank you for this opportunity to comment.

Sincerely,

A handwritten signature in black ink, reading "Gregg Clanton". The signature is fluid and cursive, with the first name "Gregg" and last name "Clanton" clearly distinguishable.

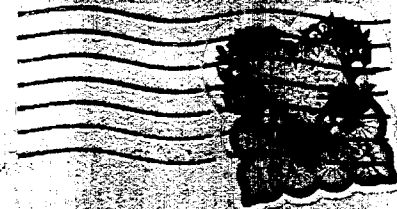
Gregg Clanton  
President

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HEALTH AND HUMAN SERVICES  
FOOD AND DRUG ADMINISTRATION  
**CROSS REFERENCE SHEET**

Docket Number/Item Code: 98N-1230/C642

See Docket Number/Item Code: 97P-0197/C643  
96P-0418/C642